

Subject: Re: Yee Documents
Date: Wednesday, April 13, 2022 at 9:19:45 AM Central Daylight Time
From: Cal Mayo
To: Dimon, Anna G., Yitz Kopel
CC: Boyle, Edward P.
[REDACTED]
Attachments: image001.png, image002.png

Anna, thanks.

Yitz, send your signature page when you can.

I can produce documents later today.

The following documents are withheld based on attorney-client privilege:

2019.09.04 Email from Janet Donaldson to Robert Gholson (GC) with cc to Chris Winstead, Donald Yee, and Marcia Landen – The balance of the email chain, ending with an email dated 2019.09.03 from Spartan Mosquito to Donald Yee, was previously produced.

2020.05.05 Email chain between Gordon Cannon and Donald Yee re seeking legal advice concerning disclosure of test results

2020.05.06 Email chain between Gordon Cannon and Donald Yee re seeking legal advice concerning contacts from Jeremy Hirsch including emails to/from Robert Gholson (GC)

Cal



J. Cal Mayo, Jr.
Mayo Mallette
Oxford & Jackson Offices

E: cmayo@mayomallette.com
O: [662.236.0055](tel:662.236.0055) J: [601.366.1106](tel:601.366.1106)
D: [662.513.4897](tel:662.513.4897) C: [662.801.3837](tel:662.801.3837)
2094 Old Taylor Road, Suite 200 | Oxford, MS 38655
4400 Old Canton Road, Suite 150 | Jackson, MS 39211
mayomallette.com

From: "Dimon, Anna G." <AGDimon@Venable.com>
Date: Tuesday, April 12, 2022 at 5:41 PM
To: Cal Mayo <cmayo@mayomallette.com>, Yitz Kopel <ykopel@bursor.com>
Cc: "Boyle, Edward P." <EPBoyle@Venable.com>
Subject: RE: Yee Documents



Thank you, Cal. Please find attached the agreement executed on behalf of AC2T. We look forward to receiving

the remainder of the responsive documents.

Best,
Anna

From: Cal Mayo <cmayo@mayomallette.com>
Sent: Tuesday, April 12, 2022 5:54 PM
To: Dimon, Anna G. <AGDimon@Venable.com>; Yitz Kopel <ykopel@bursor.com>
Cc: Boyle, Edward P. <EPBoyle@Venable.com>
Subject: Re: Yee Documents

Caution: External Email

Counsel,

I was able to get to the agreement. Here is the final version ready for signature. I accepted the edit and made no other changes.

Cal



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From: Yitz Kopel <ykopel@bursor.com>
Date: Tuesday, April 12, 2022 at 10:59 AM
To: "Dimon, Anna G." <AGDimon@Venable.com>
Cc: Cal Mayo <cmayo@mayomallette.com>, "Boyle, Edward P." <EPBoyle@Venable.com>
Subject: Re: Yee Documents

This is fine.

On Mon, Apr 11, 2022 at 5:09 PM Dimon, Anna G. <AGDimon@venable.com> wrote:

Hi All,

Minor proposed edit reflected in the attached in track. If this is acceptable, we will execute.

Thank you,
Anna

From: Yitz Kopel <ykopel@bursor.com>
Sent: Monday, April 4, 2022 6:25 PM
To: Cal Mayo <cmayo@mayomallette.com>
Cc: Dimon, Anna G. <AGDimon@Venable.com>; Boyle, Edward P. <EPBoyle@Venable.com>
Subject: Re: Yee Documents

Caution: External Email

Alright, your proposal looks fine to me.

On Mon, Apr 4, 2022 at 6:23 PM Cal Mayo <cmayo@mayomallette.com> wrote:

Yitz,

Dr. Yee will not consent to the jurisdiction of the New York court for purposes of the subpoena, the document production, or the deposition.

Cal

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On Apr 4, 2022, at 4:50 PM, Yitz Kopel <ykopel@bursor.com> wrote:

Cal - there's already a protective order in place in this action. Any reason you can't designate the docs under this?

On Fri, Apr 1, 2022 at 3:45 PM Cal Mayo <cmayo@mayomallette.com> wrote:

Anna and Yitz,

Attached is a confidentiality agreement for the Yee documents and deposition. Please let me know if you have any comments. Otherwise, please return the document with your signatures. I will then sign and date the agreement and provide you a copy with all signatures. I will also produce the remaining documents.

Have a good weekend.

Cal

J. Cal Mayo, Jr.

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